

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

~~~~~

A. PHILIP RANDOLPH INSTITUTE  
OF OHIO, et al.,

Plaintiffs,

vs. Case No. 1:20-cv-1908

FRANK LaROSE, in his official  
capacity as Ohio Secretary of State,

Defendant.

~~~~~

Zoom Deposition of
THOMAS ROBERTS

September 18, 2020

12:10 p.m.

Taken at:

Veritext Legal Solutions
Columbus, Ohio
Joyce Lynn Shannon, RPR

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 On behalf of the Plaintiff:</p> <p>4 (Via Zoom)</p> <p>5 Dechert, LLP, by</p> <p>6 THEODORE YALE, ESQ.</p> <p>7 Cira Centre</p> <p>8 2929 Arch Street</p> <p>9 Philadelphia, Pennsylvania 19104</p> <p>10 (215) 994-2455</p> <p>11 Theodore.yale@dechert.com</p> <p>12 and</p> <p>13 Lawyers' Committee for Civil Rights</p> <p>14 Under Law, by</p> <p>15 (Via Zoom)</p> <p>16 POOJA CHAUDHURI, ESQ.</p> <p>17 1500 K Street, N.W.</p> <p>18 Washington, D.C. 20005</p> <p>19 (202) 662-8600</p> <p>20 Pchaudhuri@lawyerscommittee.org</p> <p>21 and</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES, Continued:</p> <p>2</p> <p>3 On behalf of the Intervenor Defendants:</p> <p>4 (Via Zoom)</p> <p>5 Jones Day, by</p> <p>6 STEPHEN KENNY, ESQ.</p> <p>7 51 Louisiana Avenue NW</p> <p>8 Washington, D.C. 20001</p> <p>9 (202) 626-1700</p> <p>10 skenny@jonesday.com</p> <p>11</p> <p>12 ~ ~ ~ ~</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES, Continued:</p> <p>2</p> <p>3 ACLU of Ohio Foundation, by</p> <p>4 (Via Zoom)</p> <p>5 DAVID CAREY, ESQ.</p> <p>6 1108 City Park Avenue, Suite 203</p> <p>7 Columbus, Ohio 43215</p> <p>8 (614) 586-1958</p> <p>9 Dcarey@acluohio.org</p> <p>10</p> <p>11 On behalf of the Defendant:</p> <p>12 David Yost, Ohio Attorney General,</p> <p>13 by</p> <p>14 (Via Zoom)</p> <p>15 CHARLES MILLER, ESQ.</p> <p>16 MICHAEL SLIWINSKI, ESQ.</p> <p>17 30 East Broad Street, 16th Floor</p> <p>18 Constitutional Offices Section</p> <p>19 Columbus, Ohio 43215</p> <p>20 Charles.miller@ohioattorneygeneral.gov</p> <p>21 Michael.sliwinski@ohioattorneygeneral.gov</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 TRANSCRIPT INDEX</p> <p>2</p> <p>3 APPEARANCES..... 2</p> <p>4</p> <p>5 EXAMINATION OF THOMAS ROBERTS</p> <p>6 By Mr. Miller..... 6</p> <p>7 By Ms. Chaudhuri..... 17</p> <p>8</p> <p>9 REPORTER'S CERTIFICATE..... 22</p> <p>10</p> <p>11 EXHIBIT CUSTODY:</p> <p>12 NO EXHIBITS MARKED</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 6</p> <p>1 THOMAS ROBERTS, of lawful age, called for 2 examination, as provided by the Federal Rules 3 of Civil Procedure, being by me first duly 4 sworn, as hereinafter certified, deposed and 5 said as follows: 6 EXAMINATION OF THOMAS ROBERTS 7 BY MR. MILLER: 8 Q. Mr. Roberts, I'm Charles Miller. 9 I'm Counsel for the Defendant in this matter. 10 Thank you for making yourself available for 11 this deposition. 12 A. Thank you. 13 Q. Sure. Have you been deposed 14 before? 15 Do you kind of know how this works? 16 A. I have not been deposed before, but 17 I know how it works. 18 Q. Okay. The most important thing is 19 that the Court Reporter is creating a written 20 transcript, so if you could just use words to 21 answer, and not nods of the head or other 22 utterances, it will make her job a lot easier. 23 A. Okay. 24 Q. All right. Can you tell me what 25 your role is with the NAACP of Ohio?</p>	<p style="text-align: right;">Page 8</p> <p>1 advocates. And we have seven we call them game 2 changers, and one of those is civic engagement, 3 and so part of the civic engagement is to make 4 sure voters are educated, voters know their 5 rights. And then on some occasions we will do 6 voter protection coalitions to make sure that 7 we know and they know and the Boards of 8 Elections know what's going on in the various 9 cities. 10 Q. All right. Thank you for that 11 great explanation of the role of the 12 organization. 13 I just want to revisit my question 14 kind of specifically about this case. 15 You know, can you explain to me why 16 the organization wants to have a Court order 17 additional ballot dropoff locations? 18 A. Well, I think the overarching issue 19 today is COVID-19. 20 Q. Right. 21 A. The three ways that our voters are 22 used to voting are still in place. What the 23 barrier today is, with COVID-19, fewer and 24 fewer voters are interested in being in contact 25 with other voters, and so for us to be able to</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Sure. I am the President of the 2 Ohio Conference of the NAACP. Structurally, 3 the NAACP, we only have one board, and that's 4 the National Board of Directors. And the State 5 Conferences get their directives or guidelines 6 or initiatives from the State Office President 7 and CEO, Derrick Johnson. So as the President, 8 I operate as almost a manager of the 38 units 9 in Ohio to make sure they follow the 10 initiatives and the guidelines of the National 11 Board. 12 Q. Okay. Great. And your 13 organization is a Plaintiff in this matter; is 14 that correct? 15 A. Yes. 16 Q. All right. And can you explain to 17 me why your organization chose to join this 18 matter? 19 A. Well, the NAACP is probably the 20 oldest, largest, as we say, boldest civil 21 rights organization in the nation. And one of 22 our overarching missions is to make sure that 23 the voters are educated, to make sure the 24 voters' Civil Rights are not violated. And so 25 our job, our mission at the NAACP is to be</p>	<p style="text-align: right;">Page 9</p> <p>1 vote by the drop boxes is critically important 2 for those voters, like me, who are over 65, who 3 are deeply concerned about being in contact 4 with other people over a long period of time. 5 So for me, the issue of being able to have 6 multiple drop boxes makes a lot of sense for 7 health reasons, but also for accessibility 8 reasons, as well. 9 Q. Okay. The statement that it "makes 10 a lot of sense," you know, I can understand why 11 you say that, but my question is, does that 12 mean you simply view that as a good policy or 13 is there some need for it? 14 MS. CHAUDHURI: Objection to form. 15 You can answer, if you can. 16 A. Well, I'm not clear on the 17 question, and so that's why -- if you can 18 ask -- 19 Q. That's fair. 20 So basically the way that I 21 understood your answer, it sounded like you're 22 saying that it would be a good idea if there 23 were more drop boxes, and, therefore, you're in 24 favor of more drop boxes. 25 Is that an accurate understanding?</p>

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<p style="text-align: right;">Page 10</p> <p>1 A. Yeah, I think the overarching issue 2 has to be, because of COVID-19, the other 3 options have become less and less of -- I guess 4 less and less to some voters, and especially 5 with the issues that some voters are perceiving 6 with the Post Office, and so the idea of having 7 accessible drop boxes in the neighborhoods 8 makes a lot more sense than driving all the way 9 downtown to the Boards of Elections to drop off 10 your ballot. 11 Q. Sure. And, you know, I'm not going 12 to disagree with that statement. And I'm not 13 looking to disagree with that in my question. 14 But what my question is, you know, 15 assuming that that's a given, that it would be 16 better to have more drop boxes, what will 17 happen with respect to your organization's 18 mission here and the voters if there aren't 19 more drop boxes? 20 A. It would just mean -- we're a 21 volunteer organization. I'm volunteer State 22 President. All of the members in the Ohio 23 units are volunteers. So it simply means that 24 we would have to spend more of our resources 25 time-wise educating the public, educating our</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Yes. And we do that statewide. 2 Yes. President Richardson and Joe Mallory do a 3 very effective job in the Hamilton County area. 4 Q. Yes. Yes, they do. And, you know, 5 I think we all miss the good Judge who recently 6 passed, as well. It's always been good to see 7 him out and around at the events. You know, so 8 it's an outstanding organization down here. 9 So, you know, historically you had 10 efforts like that that happened. Now there's 11 COVID. And you're saying that now you'll have 12 to educate to vote at that one location. 13 But wasn't that type of education 14 happening already with respect to these other 15 type of events, like "Go to the Board of 16 Elections to vote"? 17 MS. CHAUDHURI: Objection. 18 A. To some degree. But because of 19 what we expect to be the early vote turnout at 20 the Boards of Elections or unit drop box, it 21 will increase that number, and so I think we 22 expect over 50 percent of people to vote in 23 advance. And the more you put COVID in their 24 face -- I think that's what's missing in the 25 conversation, is COVID. People don't want to</p>
<p style="text-align: right;">Page 11</p> <p>1 members and putting together a plan, an 2 initiative that would help voters understand 3 there's only one place to vote by directive of 4 the Secretary of State, and we need to follow 5 that, and so that will lead to other issues. 6 But that's basically what I'm looking at. 7 It would mean more resources and 8 more time and energy on my part as a volunteer 9 organization to mobilize our units and mobilize 10 our voters on this issue of one drop box per 11 county. 12 Q. Okay. All right. Mr. Roberts, 13 just to kind of help me with this, what county 14 are you located in personally? 15 A. Montgomery County. 16 Q. Montgomery. 17 Right now I'm down in Hamilton 18 county. And, you know, historically there's 19 been a lot of effort that's gone into getting 20 voters to vote early in person, you know, 21 concerts at the Board of Elections down here, 22 Souls to the Polls on certain Sundays when 23 they're available. 24 Are you familiar with the efforts 25 like that?</p>	<p style="text-align: right;">Page 13</p> <p>1 come in contact with other people, and so the 2 more you put that in their face, the more 3 they're going to look for ways to vote without 4 coming in contact with other people. And so 5 that's why the drop boxes -- multiple drop 6 boxes are critical to this conversation. 7 Q. And if the Plaintiffs were to 8 succeed in this location or, you know, through 9 other means, multiple drop boxes were added, 10 what would your organizations do to educate 11 voters about those additional drop boxes? 12 A. It would depend on what the 13 answer -- what the outcomes would be. But 14 let's say if we followed the example of 15 Cuyahoga, when they said we would put people in 16 the libraries, just as they do the nursing 17 homes, one D and one R at the library to vote. 18 And we would encourage people to keep their 19 distance. But that's an easy, accessible spot 20 to drop off your ballot, drop it off at the 21 library. Hopefully it would be outdoors. You 22 drop it off in an outbox and move on. And so 23 we would educate them from that point of view, 24 depending on what Boards of Election. 25 Because what I'm thinking is,</p>

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<p style="text-align: right;">Page 14</p> <p>1 Boards of Election would be thinking of these 2 ways to make it accessible to voters. And just 3 as Cuyahoga did, other counties would come up 4 with some other creative ways in order for that 5 to happen. 6 Q. And it sounds like you're 7 comfortable and supportive of what I would call 8 a multi-lateral approach of different boards 9 doing different things. 10 That is something that your 11 organization would be comfortable with? 12 A. Well, I think there has to be some 13 uniformity. But the sizes of communities' 14 counties, there's a big difference between the 15 size of a small -- I think Holmes might be one 16 of the counties we're often compared to, small 17 and large counties. You know, so I think that 18 would be one place. 19 But I think I'm okay with having 20 what the community is easy at doing, what the 21 community is well prepared to do. And so if it 22 means dropping them off at the government 23 center, you know, in the mailbox at the 24 government center, as we do some of our utility 25 bills, that's one way, or others ways, at the</p>	<p style="text-align: right;">Page 16</p> <p>1 and do something to tamper with those or 2 destroy ballots in there or things of that 3 nature. 4 A. No, I'm not as concerned with that. 5 Q. Okay. But you're supportive of 6 having the manned locations, like you just 7 described? 8 A. Yes. But I don't want that to then 9 be another barrier, "We don't have the manpower 10 to do that," and so that's why I'm kind of 11 being cautious. I want that to happen. I want 12 there to be multiple sites. And I think if you 13 do like what Cuyahoga did, that makes a lot of 14 sense. 15 Q. And let's say multiple drop boxes 16 are allowed. So you're in Montgomery County. 17 Let's say that there's several drop boxes along 18 Montgomery County, and Warren County has a few, 19 and Butler County, but some of those are 20 located near county lines or in municipalities 21 that may be across county lines, you know, 22 like -- I can't remember -- there's one like 23 down near Sugar Creek Township that's there on 24 the outer belt. I can't think of the name of 25 the town now. Centerville or something. But</p>
<p style="text-align: right;">Page 15</p> <p>1 library, like Cuyahoga. So I'm just saying 2 yes, to make it as easy and as accessible to 3 voters to vote close to their homes, close to 4 their neighborhoods is what I think our 5 organization would be very supportive of. 6 Q. Okay. And you're supportive of 7 what we can call the Cuyahoga Plan, which is 8 manned locations during office hours? 9 A. I think for security reasons and 10 for those reasons, some form of that would be 11 necessary, some form of that would be 12 necessary. For example, when you vote in the 13 nursing home, now they're going to put a D and 14 an R at the nursing homes under the direction 15 of the director of that nursing home or the 16 social person at the nursing home. They will 17 be supervising it. But those kinds of ways I 18 think would be acceptable. 19 (Thereupon, Mr. Sliwinski 20 entered the Zoom Meeting.) 21 Q. Do you have concerns if there are 22 unmanned drop boxes that are put out that? 23 You know, again, I'm in Cincinnati, 24 so say in Avondale or something, that there 25 could be some ne'er-do-well that could come in</p>	<p style="text-align: right;">Page 17</p> <p>1 there's one that kind of crosses county lines. 2 Would you make efforts to educate 3 voters, you know, to "Make sure that you vote 4 in the drop box for the county that you're in"? 5 A. Well, part of our mission as the 6 NAACP is to educate the voters on any and every 7 aspect. If that becomes an issue, then 8 certainly we would be responsible to do that 9 education, yes. 10 Q. Okay. Let me just take a couple 11 minutes to kind of review my notes here and see 12 if I have any other questions, if you don't 13 mind, sir. 14 A. Okay. 15 Q. Thank you. 16 (Discussion had off record.) 17 MR. MILLER: I don't think I have 18 any other questions for you, sir. 19 (Discussion had off record.) 20 - - - - - 21 EXAMINATION OF THOMAS ROBERTS 22 BY MS. CHAUDHURI: 23 Q. I just have a couple of really 24 quick questions for you, Tom. 25 A. Okay.</p>

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<p style="text-align: right;">Page 18</p> <p>1 Q. So you mentioned in your 2 declaration that the Ohio NAACP, and I think 3 that's 13 -- Paragraph 13 of your 4 declaration -- or, actually, it's not numbered, 5 but it's after 13 -- that most of the members 6 the NAACP serves are black. 7 Is that accurate? 8 A. Yes. Yes. You know, race is not a 9 requirement, and I think in our mission we say 10 we represent all people, so it's not -- in 11 fact, our founders were of multi-color. But, 12 yes, primarily our membership are 13 African-Americans. 14 Q. Great. And you said that the 15 majority of your members are 50-plus; is that 16 accurate? 17 A. Actually, very accurate. I am 67. 18 I don't look it. But I will say most of our 19 members are 50 and above. I will say 65 and 20 above, but yes. 21 Q. And you said that a lot of them do 22 suffer from comorbidities such as -- 23 A. High blood pressure, heart issues, 24 all of those things that COVID-19 scare us 25 about, we've got Type 2 diabetics, so all those</p>	<p style="text-align: right;">Page 20</p> <p>1 the mailbox or drive my car down the street to 2 drop it off, so it's very accessible, close to 3 home. 4 Q. And would you say some of those 5 members may not end up voting if they don't 6 have a ballot drop box close by? 7 MR. MILLER: Objection, 8 speculation. 9 You can answer, sir. 10 A. It's been my experience over 30 11 years that when you put barriers and multiple 12 barriers in front of voters, they are skittish 13 when it comes to voting, and so that's why 14 removing as many barriers as possible would be 15 NAACP'S preference. 16 Q. 17 MS. CHAUDHURI: Thanks, Tom. I 18 have no further questions. 19 MR. MILLER: Sir, I don't have any 20 follow-up questions, so we're done. 21 - - - - - 22 (Deposition concluded at 12:37 p.m.) 23 - - - - - 24 25</p>
<p style="text-align: right;">Page 19</p> <p>1 things that COVID scares us is what I was 2 talking about. 3 Q. And would those members be hesitant 4 to vote in person because of those 5 comorbidities? 6 A. Most definitely. We've had these 7 conversations statewide, and that's the big 8 concerning. And that's why we are very, very 9 much supportive of multiple drop boxes per 10 county. 11 Q. You said in Paragraph 17 of your 12 declaration that black communities and cities 13 that are your constituents live far from the 14 Boards of Elections, they don't have cars, and 15 public transportation is the only way for them 16 to get to their Boards of Elections, but public 17 transportation may be hazardous because of the 18 pandemic and many members don't want to use 19 mass transit; is that accurate? 20 A. That's very accurate, yes. 21 Q. And so how would having more drop 22 boxes help those members? 23 A. Well, accessible, close to home, 24 you know, in the neighborhood, almost like 25 taking a walk down the street to drop it off in</p>	<p style="text-align: right;">Page 21</p> <p>1 Whereupon, counsel was requested to give 2 instruction regarding the witness's review of 3 the transcript pursuant to the Federal Rules. 4 5 SIGNATURE: 6 Transcript review was requested pursuant to the 7 applicable Federal Rules of Civil Procedure. 8 9 TRANSCRIPT DELIVERY: 10 Counsel was requested to give instruction 11 regarding delivery date of transcript. 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>


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<p style="text-align: right;">Page 22</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 The State of Ohio,)</p> <p>3 SS:</p> <p>4 County of Cuyahoga.)</p> <p>5</p> <p>6 I, Joyce Lynn Shannon, RPR, a</p> <p>7 Notary Public within and for the State of Ohio,</p> <p>8 duly commissioned and qualified, do hereby</p> <p>9 certify that the within named witness, THOMAS</p> <p>10 ROBERTS, was by me first duly sworn to testify</p> <p>11 the truth, the whole truth and nothing but the</p> <p>12 truth in the cause aforesaid; that the</p> <p>13 testimony then given by the above-referenced</p> <p>14 witness was by me reduced to stenotypy in the</p> <p>15 presence of said witness; afterwards</p> <p>16 transcribed, and that the foregoing is a true</p> <p>17 and correct transcription of the testimony so</p> <p>18 given by the above-referenced witness.</p> <p>19 I do further certify that this</p> <p>20 deposition was taken at the time and place in</p> <p>21 the foregoing caption specified and was</p> <p>22 completed without adjournment.</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 24</p> <p>1 Veritext Legal Solutions</p> <p>2 1100 Superior Ave</p> <p>3 Suite 1820</p> <p>4 Cleveland, Ohio 44114</p> <p>5 Phone: 216-523-1313</p> <p>6</p> <p>7 September 19, 2020</p> <p>8 To: POOJA CHAUDHURI</p> <p>9</p> <p>10 Case Name: A. Phillip Randolph Institute Of Ohio, Et Al. v. LaRose,</p> <p>11 Frank, etc.</p> <p>12 Veritext Reference Number: 4263593</p> <p>13 Witness: Thomas Roberts Deposition Date: 9/18/2020</p> <p>14</p> <p>15 Dear Sir/Madam:</p> <p>16</p> <p>17 Enclosed please find a deposition transcript. Please have the witness</p> <p>18 review the transcript and note any changes or corrections on the</p> <p>19 included errata sheet, indicating the page, line number, change, and</p> <p>20 the reason for the change. Have the witness' signature notarized and</p> <p>21 forward the completed page(s) back to us at the Production address</p> <p>22 shown</p> <p>23 above, or email to production-midwest@veritext.com.</p> <p>24</p> <p>25 If the errata is not returned within thirty days of your receipt of</p> <p>26 this letter, the reading and signing will be deemed waived.</p> <p>27</p> <p>28 Sincerely,</p> <p>29</p> <p>30 Production Department</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35 NO NOTARY REQUIRED IN CA</p>
<p style="text-align: right;">Page 23</p> <p>1 I do further certify that I am not</p> <p>2 a relative, counsel or attorney for either</p> <p>3 party, or otherwise interested in the event of</p> <p>4 this action.</p> <p>5 IN WITNESS WHEREOF, I have hereunto</p> <p>6 set my hand and affixed my seal of office at</p> <p>7 Cleveland, Ohio, on this 18th day of</p> <p>8 September, 2020.</p> <p>9</p> <p>10</p> <p>11</p> <p>12 </p> <p>13</p> <p>14 Joyce Lynn Shannon, RPR, Notary</p> <p>15 Public within and for the State of</p> <p>16 Ohio</p> <p>17</p> <p>18 My commission expires December 21, 2020.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 25</p> <p>1 DEPOSITION REVIEW</p> <p>2 CERTIFICATION OF WITNESS</p> <p>3</p> <p>4 ASSIGNMENT REFERENCE NO: 4263593</p> <p>5 A. Phillip Randolph Institute Of Ohio, Et Al. v. LaRose, Frank</p> <p>6 DATE OF DEPOSITION: 9/18/2020</p> <p>7 WITNESS' NAME: Thomas Roberts</p> <p>8 In accordance with the Rules of Civil</p> <p>9 Procedure, I have read the entire transcript of</p> <p>10 my testimony or it has been read to me.</p> <p>11 I have made no changes to the testimony</p> <p>12 as transcribed by the court reporter.</p> <p>13</p> <p>14 Date _____ Thomas Roberts</p> <p>15 Sworn to and subscribed before me, a</p> <p>16 Notary Public in and for the State and County,</p> <p>17 the referenced witness did personally appear</p> <p>18 and acknowledge that:</p> <p>19</p> <p>20 They have read the transcript;</p> <p>21 They signed the foregoing Sworn</p> <p>22 Statement; and</p> <p>23 Their execution of this Statement is of</p> <p>24 their free act and deed.</p> <p>25</p> <p>26 I have affixed my name and official seal</p> <p>27</p> <p>28 this _____ day of _____, 20____.</p> <p>29</p> <p>30 _____</p> <p>31 Notary Public</p> <p>32 _____</p> <p>33 Commission Expiration Date</p> <p>34</p> <p>35</p>

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1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS

2 ASSIGNMENT REFERENCE NO: 4263593

3 A. Phillip Randolph Institute Of Ohio, et al. v. LaRose Frank
DATE OF DEPOSITION: 9/18/2020

4 WITNESS' NAME: Thomas Roberts

5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.

7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 well as the reason(s) for the change(s).

9 I request that these changes be entered
as part of the record of my testimony.

10

11 I have executed the Errata Sheet, as well
as this Certificate, and request and authorize
that both be appended to the transcript of my
12 testimony and be incorporated therein.

13 _____
Date Thomas Roberts

14

15 Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
16 and acknowledge that:

17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and
Their execution of this Statement is of
20 their free act and deed.

21 I have affixed my name and official seal
22 this _____ day of _____, 20____.

23 _____
Notary Public

24

25 _____
Commission Expiration Date

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1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST

2 ASSIGNMENT NO: 4263593

3 PAGE/LINE(S) / CHANGE /REASON

4 _____

5 _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____
Date Thomas Roberts

21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____

22 DAY OF _____, 20____.

23 _____
Notary Public

24

25 _____
Commission Expiration Date

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[1100 - centerville]

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1	43215 3:7,19 44114 24:2	advance 12:23 advocates 8:1 affixed 23:6 25:15 26:21 aforesaid 22:12 african 18:13 age 6:1 al 1:6 24:6 25:3 26:3 allowed 16:16 americans 18:13 answer 6:21 9:15 9:21 13:13 20:9 appear 25:11 26:15 appearances 2:1 3:1 4:1 5:3 appended 26:11 26:18 applicable 21:7 approach 14:8 arch 2:8 area 12:3 aspect 17:7 assignment 25:2 26:2 27:2 assuming 10:15 attached 26:7 attorney 3:12 23:2 authorize 26:11 available 6:10 11:23 ave 24:1 avenue 3:6 4:7 avondale 15:24	barrier 8:23 16:9 barriers 20:11,12 20:14 basically 9:20 11:6 behalf 2:3 3:11 4:3 belt 16:24 better 10:16 big 14:14 19:7 bills 14:25 black 18:6 19:12 blood 18:23 board 7:3,4,11 11:21 12:15 boards 8:7 10:9 12:20 13:24 14:1 14:8 19:14,16 boldest 7:20 box 11:10 12:20 17:4 20:6 boxes 9:1,6,23,24 10:7,16,19 13:5,6 13:9,11 15:22 16:15,17 19:9,22 broad 3:17 butler 16:19
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Defendant's Exhibit P

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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